

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.**

CRIMINAL NO. 22-342 (SCC)

SUPPLEMENTAL INFORMATIVE MOTION REGARDING MEET AND CONFER

The United States of America files this supplemental informative motion regarding a meet and confer with the defendants addressing the need for a Classified Information Procedures Act (“CIPA”) § 3 protective order, pursuant to the Court’s Order (ECF No. 615), and states as follows:

1. This motion supplements the informative motion filed on August 16, 2024 (ECF No. 627).
2. As noted in the Government’s previous informative motion, the Government and Mr. Herrera have been working to finalize a protective order acceptable to both sides. (*Id.*). The Government has reviewed changes to the draft protective order (ECF No. 583-1) proposed by Mr. Herrera and has agreed to two of Mr. Herrera’s proposed changes. There is a final provision that the Government and Mr. Herrera are still attempting to resolve. The Government is optimistic that the parties will either be able to come to an agreement on a final draft protective order or narrow the dispute to a discrete provision.
3. The Government therefore respectfully requests one additional week to either come to a final agreement with Mr. Herrera or notify the Court of the parties’ respective position on any remaining, disputed provisions. The Government will update the Court by August 30, 2024.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 23rd day of August, 2024.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

/s/ Ryan R. Crosswell
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